

ORIGINAL FILED

OCT 1 2002

Richard W. Wierking
U.S. District Court
Northern District of California
San Jose

KEVIN V. RYAN (CSBN 118321)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

YAN MING SHAN,
a/k/a Shan Yan Ming,

Defendant.

CR

02 20127 JF

VIOLATION: Title 18, United States Code,
Section 1030(a)(4) – Unauthorized Access
of a Protected Computer with Intent to
Defraud and Obtaining Something of Value

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges:

On or about September 10, 2002, in the County of Santa Clara, the Northern District of
California, the defendant

YAN MING SHAN,
a/k/a Shan Yan Ming,

did knowingly and with intent to defraud, access a protected computer belonging to 3DGeo
Development, Inc. without authorization and exceeding authorized access, and by means of such
conduct did further the intended fraud and obtain something of value, to wit: proprietary software

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INDICTMENT

1 programs and source code belonging to 3DGeo Development, Inc., in violation of Title 18,
2 United States Code, Section 1030(a)(4).

3 DATED: *1 October 2002*

A TRUE BILL.

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6 *James A. Perea*
7 FOREPERSON

8 KEVIN V. RYAN
9 United States Attorney

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11 *Elizabeth De La Vega*
12 ELIZABETH DE LA VEGA
13 Chief, San Jose Branch Office

14 (Approved as to form: *Adam Braun*)

15 AUSA Adam Braun
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